

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

TROY BEARDEN, individually and on behalf
of all persons similarly situated,

Plaintiff,

v.

PRECISION AIR DRILLING
SERVICES, INC.,

Defendant.

Case: 11-cv-1511

Judge Nora Barry Fischer

ELECTRONICALLY FILED

MOTION FOR ADMISSION *PRO HAC VICE*

Now COMES Plaintiff Troy Bearden, by his counsel Shanon J. Carson and Sarah R. Schalman-Bergen, members in good standing of the Bar of the United States District Court for the Western District of Pennsylvania and attorneys with Berger & Montague, P.C., who hereby move this Honorable Court to admit James A. Wells, *pro hac vice*, for purposes of the above-captioned action, to serve as counsel for Plaintiff. In support of this Motion, undersigned counsel states as follows:

1. James A. Wells is a senior associate at Berger & Montague, P.C., 1622 Locust Street, Philadelphia, Pennsylvania 19103.

2. Mr. Wells received his Juris Doctor from the Temple University James E. Beasley School of Law in 1998. He is licensed to practice in, and is a member in good standing of the bar of, the State of Pennsylvania. Mr. Hughes is also admitted to practice before the United States District Court, Eastern District of Pennsylvania.

3. Mr. Wells has never been subject to any discipline by any court, jurisdiction, or state.

4. Mr. Wells has read and understands the Local Rules and has stated that he will comply with the Federal Rules of Civil Procedure and the applicable Local Rules.

5. Mr. Wells certifies that he is a registered user of the Electronic Case Filing system in the United States District Court for the Western District of Pennsylvania.

6. Attached hereto as Exhibit A in support of this Motion is an Affidavit of Attorney James A. Wells.

7. A proposed Order is attached.

WHEREFORE, the undersigned, a member in good standing of the bar of this Court, respectfully moves this Court to enter an Order admitting James A. Wells to the bar of this Court, *pro hac vice*.

Dated: September 21, 2012

Respectfully submitted,

BERGER & MONTAGUE, P.C.

s/ Sarah R. Schalman-Bergen
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon counsel for Defendant through the Court's ECF system this 21st day of September, 2012, addressed as follows:

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s/ Sarah R. Schalman-Bergen
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